



**48 Wall Street, Suite 11, Manhattan, NY 10005**

September 30, 2019

**VIA ELECTRONIC MAIL**

Honorable Vernon S. Broderick  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: Colon v. The City of New York, et al. No. 16-CV-4540  
Williams v. The City of New York, et al. No. 16-CV-8193**

Dear Judge Broderick:

The Florestal Law Firm, PLLC is counsel to Sibyl Colon and Allison Williams (hereinafter, the “Plaintiffs”), in the above referenced matter. Pursuant to your Honor’s Order dated August 5, 2019, Plaintiffs are proposing a supplemented summary judgment briefing schedule to the one filed by John Corbin Carter the City Defendant’s attorney on even date. Accordingly, Plaintiffs reserve their right to file cross motions for summary judgment with their opposition papers on March 20, 2020. Defendants to oppose with their reply papers by April 17, 2020. Plaintiffs to reply by May 15, 2020. These dates are proposals and have not yet been agreed to by Defendants’ counsels John Corbin Carter and Jane E. Lippman, as she is out of the office due to the Jewish holiday.

Respectfully,  
/s/ Marcel Florestal

cc: All counsel via electronic mail.